

STATE OF ILLINOIS  
ILLINOIS STATE POLICE MERIT BOARD

IN THE MATTER OF

TROOPER JONATHAN V. MORRIS  
I. D. #5635

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DOCKET NO. 15-2

**DECISION**

This matter coming to be heard before the Illinois State Police Merit Board on July 17, 2015 at its regular scheduled quarterly Board Meeting for consideration of the Joint Motion to Dismiss of the Merit Board submitted by Mr. Guy Studach and Mr. Brian Cummings, AAG.

The Board voted unanimously to approve this Joint Motion to Dismiss which hereby dismisses this cause of action due to the resignation of Jonathan Morris from the Illinois State Police.

A. George Pradel

A. George Pradel  
Chairman  
Illinois State Police Merit Board

DATED: July 20, 2015

RECEIVED

JUL 13 2015

ILLINOIS STATE POLICE MERIT BOARD  
OF THE STATE OF ILLINOIS

ILLINOIS STATE POLICE  
MERIT BOARD

In Re the Matter Of:

TROOPER JONATHAN MORRIS  
I.D. 5635  
[REDACTED]

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DOCKET NO. 15-2

JOINT MOTION TO DISMISS

Now comes LEO SCHMITZ, Director, Illinois State Police, by his attorney, Lisa Madigan, Attorney General of the State of Illinois, and Assistant Attorney General Brian Cummings, and TROOPER JONATHAN MORRIS, by his attorney, Guy A. Studach, and respectfully request that the Illinois State Police Merit Board dismiss this matter as moot. In support thereof, the parties state as follows:

1. Respondent, Jonathan Morris, resigned from the Illinois State Police effective June 29, 2015. A copy of the parties Resignation Agreement is attached hereto as Exhibit 1. Respondent, Jonathan Morris, was formerly employed by the department and held the rank of trooper, ID number 5635.
2. Due to the fact that Respondent has resigned from the department, he is no longer employed as an Illinois State Police officer, and therefore this matter should be dismissed with prejudice as moot.

WHEREFORE, for the foregoing reasons, the parties respectfully request that this matter be dismissed with prejudice as moot.

LEO SCHMITZ, Director  
Illinois State Police

By   
Brian Cummings  
Assistant Attorney General  
100 W. Randolph St., 13<sup>th</sup> Fl.  
Chicago, IL 60601  
312/814-4450

TROOPER JONATHAN MORRIS,

By   
Guy A. Studach  
Troopers Lodge #41  
5880 S. Sixth St. Rd.  
Springfield, IL 62703  
217/529-4104

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JUL 13 2015

ILLINOIS STATE POLICE  
MERIT BOARD

ILLINOIS STATE POLICE  
Notice of Resignation/Retirement

TO: Michael Zerbonia D00  
(Deputy Director) (Division)  
FROM: MORRIS JONATHAN ✓ 5635  
Last First M.I. ID No.

I hereby submit my resignation as a Trooper in the Illinois State Police for the following reason(s):

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I request that my departure become effective at the close of business 6-29-2015

I also request a lump sum payment for the accrued time that is due me, subject to the current policy limitation for separation. This resignation is executed by me for the purpose of terminating my employment, and is submitted in compliance with current policy of the Illinois State Police.

This resignation is Voluntary TPA 5635 6-25-2015  
(Employee Signature) (Date)

\*\*\*\*\*  
FOR OFFICIAL USE ONLY

Holidays Accrued

Vacation Days Accrued

Other Time Accrued (Specify) \_\_\_\_\_

Resigned in good standing. If no, explain: YES NO

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Signature (deputy director or designee)

IL 493-0937

ISP 2-292 (2/89)



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MAR 20 2015

ILLINOIS STATE POLICE  
MERIT BOARD

STATE OF ILLINOIS  
ILLINOIS STATE POLICE MERIT BOARD

**IN THE MATTER OF:**

**TROOPER JONATHAN V. MORRIS**  
I.D. No. 5635

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)  
Illinois State Police  
Merit Board No.  
)  
)

[REDACTED]

**COMPLAINT**

**NOW COMES** Leo P. Schmitz, Director of the Illinois State Police, and pursuant to 20 ILCS 2610/14 and 80 Ill. Admin. Code § 150.575 states as follows:

**STATEMENT OF FACTS**

1. Jonathan V. Morris (Respondent) is employed as a State Police Officer by the Illinois State Police (Department) and holds the rank of Trooper. At all times relevant to this Complaint, Respondent was assigned to District 15, the Illinois Tollway. Respondent has been employed by the Department since June 29, 2008.
2. On September 26, 2012, the Illinois State Police (ISP), Division of Internal Investigation (DII) received a Complaint Against Department Member Form (CADMF) completed by Calumet Park Police Department (CPPD) Patrol Coordinator Gerard Corrigan regarding an allegation of Improper Conduct, Association with Known Criminals, Conformance to Laws, and Misuse of Official Position against ISP District 15 Trooper Jonathan Morris #5635.
3. Respondent was administratively interviewed on October 2, 2014, in response to this CADMF.

Showtime's Sports Bar

4. Showtime's Sports Bar is located at 1566 West 127<sup>th</sup> Street in the Village of Calumet Park, Illinois. At all times relevant to this complaint, Mr. Timothy Echols was the manager or operator of Showtime's, whose principal business was the sale of alcoholic beverages. Bobby Simmons, Jr. is a former professional basketball player, who is friends with Echols and frequented Showtime's.
5. During all times relevant to this complaint, Respondent was friends with Echols and Simmons and went to Showtime's on a regular basis.
6. At his October 2, 2014, administrative interview, Respondent admitted that he hung out at Showtime's and associated with Echols and Simmons on a regular basis; Respondent further admitted Showtime's primarily served alcoholic beverages and periodically had stripper night and had even been shut down due to the strippers.
7. On multiple occasions from 2012 through 2013, Respondent was observed by local law enforcement officers near the front door of Showtime's monitoring patrons entering and exiting the establishment. Showtime's is known by local law enforcement officers to have been investigated and raided for illegal activity, including but not limited to drug trafficking and prostitution.

Calumet Park Police Department

8. On or about August 26, 2012, Respondent was ticketed by CPPD for parking on the sidewalk in front of Showtime's. The procedures for contesting the citation are printed on the citation.
9. On or about September 5, 2012, Respondent, while on duty went to CPPD and met with Coordinator Mark Smith and Chief Mark Davis of the CPPD and asked if there was

anything that could be done to remove the August 26, 2012, parking citation from his record. Respondent told Coordinator Smith and Chief Davis the citation, which Respondent had in his hand, did not accurately reflect the circumstances as they occurred. Chief Davis gave Coordinator Smith permission to vacate the citation.

10. Chief Davis was later told by CPPD Officers, who were present when the citation was issued to the Respondent, that the parking citation was valid and that the Respondent had been rude and disrespectful to them. Chief Davis, then, reinstated the citation.
11. On or about September 16, 2012, Respondent telephoned CPPD Officer Jerald Nettles and asked how he could get the citation dismissed.
12. On or about September 19, 2102, Respondent received a notice from the city of Calumet Park regarding the August 26, 2012, parking citation, which he had not yet paid. Respondent, while on duty, again went to CPPD. While at the CPPD, Respondent was told by Coordinator Smith that if he wanted the citation voided, he would need to talk to CPPD Officer Robert Gerristen, who had issued the parking citation.
13. Later the same day, Respondent, while on duty, returned to CPPD and asked Deputy Chief Mann for permission to address the CPPD evening roll call. Respondent addressed the CPPD officers at evening roll call about professional courtesy and his displeasure that he had been issued a parking citation by one of their officers on his personal vehicle, while it was illegally parked at Showtime's.
14. Upon leaving CPPD, Respondent used his Mobile Data Computer (MDC) to conduct a LEADS inquiry of the vehicle registrations for the personal vehicles belonging to CPPD Officers Carmichael Lewis and Gerriston.

15. During his administrative interview, Respondent admitted that he did not, at any time, request or receive permission from his Department supervisors to go to CPPD while on duty or to address their roll call. Respondent admitted he went to CPPD twice after receiving notice in the mail regarding a parking citation he had been issued by CPPD. Respondent denied that he received the parking citation on the date it was issued. Respondent also admitted the second time he went to CPPD, he was on duty in his Department squad car and uniform. Respondent denied that he ever asked to have the August 26, 2012, parking citation voided. Respondent stated he addressed the CPPD roll call and asked that if they are "going to write another cop a ticket, at least have the decency or the heart to at least identify yourself." Respondent asked who had issued him the parking citation but said no one answered him.

16. During his administrative interview, Respondent admitted that while he was at CPPD, he ran a LEADS inquiry on the vehicle registration of a vehicle parked in the CPPD parking lot but denied he knew the vehicle belonged to CPPD Officer Gerristen. He stated he conducted the LEADS inquiry because the vehicle had no front license plate, had tinted windows, and was parked in the middle of the parking lot. Respondent admitted he took no enforcement action related to the equipment violations he identified. Respondent denied that he conducted a LEADS inquiry on the vehicle registration of a vehicle that belonged to CPPD Officer Lewis.

17. Approximately two days after Respondent addressed the CPPD roll-call, he met CPPD Officer Nettles for breakfast. Respondent admitted to CPPD Officer Nettles that he conducted LEADS inquiries on CPPD officers' personal vehicle registrations because he wanted to know where CPPD Officer Gerristen lived.

Bobby Simmons, Jr. and Timothy Echols

18. Echols has a 1998 Class 4 Felony conviction for Unlawful Use of a Weapon, two 2003 Class 3 Felony convictions for Forgery, and one 2006 Class 3 Felony conviction for Forgery.
19. On or about October 3, 2012, Respondent used his MDC to conduct a LEADS inquiry of the vehicle registrations for the personal vehicle belonging to Simmons. During his administrative interview, Respondent admitted he used his MDC to conduct LEADS inquiries on Echols and Simmons and that he did so for curiosity rather than for a law enforcement purpose.
20. On or about February 4, 2013, District Chicago Trooper Victor Harris, #4779, conducted a traffic stop on a vehicle for speeding and conducted an inquiry on the registration which returned stolen. The driver, Echols, was the only occupant and was placed into custody. Trooper Harris found a black semi-automatic Glock 9mm handgun in the vehicle and transported Echols to the Chicago Police Department 5<sup>th</sup> District to further investigate the stolen motor vehicle and unlawful use of weapon.
21. At the time Trooper Harris conducted the traffic stop on Echols, Respondent was having breakfast with District Chicago Trooper Scott Payne, #5643, who heard Trooper Harris call in the traffic stop to District Chicago radio. Trooper Payne advised Respondent that Trooper Harris had Echols stopped. Trooper Payne and Respondent responded to the location of the traffic stop on I-57 at the Southbound ramp to Vollmer Road (Eastbound).
22. Shortly thereafter, in his assigned Department squad car and uniform, Respondent went to CPD 5<sup>th</sup> District, where Trooper Harris had transported Echols. Respondent advised Trooper Harris that Echols was his brother but later admitted that was untrue. Trooper

Harris and Respondent discussed Echols previous felony arrest for Unlawful Use of Weapon. During his administrative interview, Respondent admitted Trooper Harris encouraged Respondent to be careful with whom he associated.

23. During the time of Trooper Harris' traffic stop of Echols, Respondent's assigned patrol did not include I-57 at Vollmer Road or the CPD 5th District, and he was not responding to a request for assistance from Trooper Harris.
24. On or about August 2, 2013, Respondent was criminally interviewed by the Department and Federal Bureau of Investigations and provided a Department "Notice of Criminal Investigative Interview" form. He was advised the information discussed in the interview was confidential and was not to be discussed with anyone.
25. During his criminal interview, Respondent admitted he was friends with Echols and described their relationship as close. Respondent advised he maintains frequent telephonic contact with Echols and visits Showtime's, which Echols manages, regularly as a patron. Respondent admitted he has worn his Department uniform to Showtime's and has met a CPPD Officer with whom he is friends there on occasion while he was on duty. Respondent also admitted he had heard that Echols was involved with selling drugs from a Cook County Police Officer. Respondent admitted that he was informed by CPPD that Showtime's had been shut down due to a liquor license violation and suspected prostitution. Respondent admitted that he conducted LEADS inquiries of both Echols and Simmons. Respondent admitted that he saw Echols in possession of a handgun on his person at Showtime's while interacting with CPPD officers during an incident at Showtime's, at which time he knew Echols was a convicted felon and that he later told Echols that he needed to stop carrying the firearm.

26. During his administrative interview, Respondent denied ever seeing Echols in possession of a handgun on his person at Showtime's. Respondent stated that after Trooper Harris suggested he dissociate himself with Echols, there was not any further "real contact" with Echols. He stated from then on, "it was real distant." Respondent said that from the time of his conversation with Trooper Harris until his criminal interview, he was not talking to Echols on a regular basis. Respondent stated that up to the point of his administrative interview Echols was sending him a lot of text messages but said he does not respond to Echols. Respondent further stated that Echols had called him many times but denied that he had called Echols regularly.

27. Between August 2, 2013, and August 21, 2013, Respondent spoke to and advised Echols that Echols was under investigation. Respondent advised Echols that Respondent was questioned about Echols involvement with illegal drug distribution.

28. During his administrative interview, Respondent stated:

"There are ISP violations that I have broken. I have broken the violation of not filing Secondary Employment. I have broken the violation of running LEADS inquiry. I have broken the violation of misuse of company time on doing stuff on my squad car with the department of Calumet Park Police Department, while I was off work. What I have not done is being involved in any criminal activity. I have not in any shape or form continued or have desired to continue the relationship as such as what I used to have with Timothy Echols, since knowing that he's a convicted Felon ,..."

29. Respondent has an approved "Request for Secondary Employment" form (ISP2-72) for substitute teaching and chaperoning after school activities at Tinley Park High School,

submitted on or about January 19, 2010. Respondent has no other "Request for Secondary Employment" forms on file.

30. During his administrative interview Respondent admitted he had provided security for Derrick Rose, Dwayne Wade, Floyd Mayweather, and others without submitting a "Request for Secondary Employment" form as required by ISP policy.

**COUNT I**

**IMPROPER PATRONIZATION**

31. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
32. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.22., which states:

"Except in the performance of duty or while acting under proper and specific orders from a superior officer, officers will not knowingly run, enter, visit or frequent a house of prostitution, gambling house or establishment wherein the laws of the United States, the state, or the local jurisdiction are violated, solicit a prostitute or pimp, or patronize a prostitute or pimp."

**(First offense – Level 7 Misconduct: Up to Termination)**

Respondent violated this rule in that he frequented Showtime's Sports Bar after he became aware such establishment had been shut down for having women strip in violation of the laws of the Local jurisdiction.

**COUNT II**

**OFFICIAL MISCONDUCT**

33. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
34. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.1., which states:

"Officers will uphold the Constitutions of the United States and the state of Illinois, obey all federal, state and local laws in which jurisdiction the officer is present, and comply with court decisions and orders of courts having jurisdiction."

**(First offense – Level 7 Misconduct: Up to Termination)**

Respondent violated this rule in that from September 2012 through October 2012, while acting in his official capacity, Respondent violated state law, Official Misconduct, 720 ILCS 5/33-3(b), a class 3 felony, when he knowingly performed an act he knew he was forbidden by law to perform when he accessed and used the LEADS database system to obtain information on individuals or vehicle registrations belonging to CPPD Officers Robert Gerristen and Carmichael Lewis, Mr. Bobby Simmons, Jr., and others for personal purposes in violation of 20 Il. Admin. Code 1240.80.

**COUNT III**

**DIVULGING CONFIDENTIAL INFORMATION**

35. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
36. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.31.b., which states:

“Officers will not access or divulge any confidential information, existing in any form, or the identity of any persons giving confidential information or release items of evidence, documents, photographs, etc., to members of the news media or others outside the criminal justice system without the express permission of the Director of the ISP, or his designee.”

**(First offense – Level 7 Misconduct: Up to Termination)**

Respondent violated this rule in that he divulged confidential information to Timothy Echols without the express permission of the Director or his designee, when, shortly after Respondent was criminally interviewed on August 2, 2013, by the Department and the FBI, Respondent informed Echols that Respondent was questioned about Echols’ possible involvement in illegal activity.

**COUNT IV**

**FAILURE TO TRUTHFULLY ANSWER QUESTIONS**

37. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
38. All or a portion of the facts set forth herein constitute Respondent’s violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.41.c., which states:

“Officers are required to truthfully answer questions by, or render material and relevant statements to, competent authority in a Department personnel investigation when said officer is the subject of the investigation and has been advised of his/her statutory administrative proceedings rights if the allegation indicates that a recommendation for demotion, suspension of more than 15 days or discharge from the Department is probable.”

(First Offense – Level 7 Misconduct: Up to Termination)

Respondent violated this rule in that during his administrative interview he denied that he had had regular or continuous associations or dealings with Timothy Echols after he learned about Echols' reputation in the community for involvement in criminal behavior.

**COUNT V**

**FAILURE TO TRUTHFULLY ANSWER QUESTIONS**

39. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
40. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.41.c., which states:

"Officers are required to truthfully answer questions by, or render material and relevant statements to, competent authority in a Department personnel investigation when said officer is the subject of the investigation and has been advised of his/her statutory administrative proceedings rights if the allegation indicates that a recommendation for demotion, suspension of more than 15 days or discharge from the Department is probable."

**(First Offense – Level 7 Misconduct: Up to Termination)**

Respondent violated this rule in that during his administrative interview he denied that he ever observed Echols with a weapon on him at the Showtime's Sports Bar, when in fact during his criminal interview he told agents he had not only seen Echols with the weapon, but told Echols that he needed to stop carrying it.

**COUNT VI**

**FAILURE TO AVOID ASSOCIATIONS WITH PERSONS**

**WHO ARE CONVICTED FELONS**

41. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
42. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.21., which states:

"Except as necessary to the performance of official duties, or where unavoidable because of other family relationships of the officer, officers will avoid regular or continuous associations or dealings with persons whom they know, or should know, are persons under criminal investigation or indictment, or who have a reputation in the community or the Department for present or past involvement in felonious or criminal behavior, or who have a felony conviction."

**(First Offense – Level 4 Misconduct, 31-45 days)**

Respondent violated this rule in that on a regular basis, he associated with Timothy Echols, who he knew or should have known is a convicted felon.

**COUNT VII**

**INTERFERING WITH INVESTIGATIONS**

**BEING HANDLED BY ANOTHER OFFICER**

43. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
44. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.29., which states:

“Officers will not interfere with cases being handled by other officers of the Department or by any other governmental agency unless: ordered to intervene by a superior officer; or the intervening officer reasonably believes that a manifest injustice would result from failure to take immediate action. When intervention occurs, a report of such intervention will be made to a superior officer as soon as possible.”

**(First Offense – Level 3 Misconduct: 15 to 30 days)**

Respondent violated this rule in that on February 4, 2013, Respondent left his assigned patrol and arrived on scene of District Chicago Trooper Victor Harris’ arrest of Echols. Respondent followed Trooper Harris to the Chicago Police Department, where he inquired about the arrest of Echols and spoke on Echols’ behalf.

**COUNT VIII**

**INTERFERING WITH INVESTIGATIONS**

**BEING HANDLED BY ANOTHER OFFICER**

45. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
46. All or a portion of the facts set forth herein constitute Respondent’s violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.29., which states:

“Officers will not interfere with cases being handled by other officers of the Department or by any other governmental agency unless: ordered to intervene by a superior officer; or the intervening officer reasonably believes that a manifest injustice would result from failure to take immediate action. When intervention

occurs, a report of such intervention will be made to a superior officer as soon as possible."

**(First Offense – Level 3 Misconduct: 15 to 30 days)**

Respondent violated this rule in that on August 2, 2013, after being criminally interviewed by the Department and FBI, Respondent informed Echols that Respondent was questioned about Echols' possible involvement in illegal activity.

**COUNT IX**

**FAILURE TO USE HIS STATE ISSUED MDC SYSTEMS**

**IN ACCORDANCE WITH ESTABLISHED PROCEDURE**

47. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
48. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.66., which states:

"Officers will use Mobile Data Computer (MDC) systems in accordance with established Department procedures."

**(First Offense – Level 2 Misconduct: 4 to 10 days)**

Respondent violated this rule in that on September 19, 2012, Respondent used his MDC to access the LEADS database system to obtain information on individuals or the vehicle registration belonging to Calumet Park Police Officers Robert Gerristen and Carmichael Lewis for non-law enforcement purposes in violation of SRV-208, Mobile Data Computer Systems, Paragraphs III.C.1.b., III.C.2.b, and III.D.1.

**COUNT X**

**FAILURE TO USE HIS STATE ISSUED MDC SYSTEMS**

**IN ACCORDANCE WITH ESTABLISHED PROCEDURE**

49. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
50. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.66., which states:

"Officers will use Mobile Data Computer (MDC) systems in accordance with established Department procedures."

**(First Offense – Level 2 Misconduct: 4 to 10 days)**

Respondent violated this rule in that on October 3, 2012, Respondent used his MDC to access the LEADS database system to obtain information on individuals or the vehicle registration belonging to Bobby Simmons, Jr. and others for non-law enforcement purposes in violation of SRV-208, Mobile Data Computer Systems, Paragraphs III.C.1.b., III.C.2.b, and III.D.1.

**COUNT XI**

**BRINGING THE DEPARTMENT INTO DISREPUTE**

51. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
52. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.8., which states:

"Officers will maintain a level of conduct in their personal and business affairs that is in keeping with the highest standards of the law enforcement profession.

Officers will not participate in any conduct that impairs their ability to perform as law enforcement officers or causes the Department to be brought into disrepute.”

**(First Offense – Level 2 Misconduct: 4 to 10 days)**

Respondent violated this rule in that from 2012 through 2013, Respondent, while off-duty, was intermittently observed positioned at the front door at Showtime's Sports Bar monitoring patrons entering and exiting of the establishment, which is known to have been investigated and raided for drug trafficking and prostitution.

**COUNT XII**

**BRINGING THE DEPARTMENT INTO DISREPUTE**

53. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
54. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.8., which states:

“Officers will maintain a level of conduct in their personal and business affairs that is in keeping with the highest standards of the law enforcement profession. Officers will not participate in any conduct that impairs their ability to perform as law enforcement officers or causes the Department to be brought into disrepute.”

**(First Offense – Level 2 Misconduct: 4 to 10 days)**

Respondent violated this rule in that on September 19, 2012, Respondent, while on-duty and without authority from his Department supervisor(s), addressed Calumet Park Police officers during their roll-call regarding professional courtesy and his displeasure with receiving a parking citation from an unknown Calumet Park Police Officer on his personal vehicle, while it was illegally parked at Showtime's Sports Bar.

### COUNT XIII

#### USE OF OFFICIAL POSITION TO AVOID CONSEQUENCES OF ILLEGAL ACTS

55. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
56. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.14.c., which states:

"Officers will not use their official position, official identification cards or stars for avoiding consequences of illegal acts."

**(First Offense – Level 2 Misconduct: 4 to 10 days)**

Respondent violated this rule in that on or about September 5, 2012, and on or about September 19, 2012, Respondent, while on-duty and without authority from his Department supervisor(s), met with senior officials from the Calumet Park Police Department regarding a parking citation he received from an unknown Calumet Park Police officer. Rather than following the procedures for contesting the ticket as outlined on the citation, Respondent requested the citation be dismissed.

### COUNT XIV

#### ENTERING AN ESTABLISHMENT WHOSE PRINCIPAL BUSINESS IS THE SALE OF ALCOHOLIC BEVERAGES

57. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
58. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.8., which states:

“Officers will not enter any establishment or place where the principal business is the sale of alcoholic beverages while on duty and/or in uniform, except in the performance of duty.”

**(First Offense – Level 2 Misconduct: 4 to 10 days)**

Respondent violated this rule in that between 2012 and 2013, Respondent entered Showtime’s Sports Bar, an establishment where the principal business is the sale of alcoholic beverages, while on-duty in his Department uniform but not in the performance of his duties.

**COUNT XV**

**FAILURE TO OBEY THE DEPARTMENT VEHICLE USAGE POLICY**

59. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
60. All or a portion of the facts set forth herein constitute Respondent’s violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.39., which states:

“Officers will operate official vehicles in a careful and prudent manner, and will obey all laws and all Department directives pertaining to such operation.”

**(First Offense – Level 1 Misconduct: Reprimand to 3 days)**

Respondent violated this rule in that between 2012 and 2103, without authorization, he drove his ISP squad car to Showtime’s Sports Bar for reasons other than official state business use in violation of EQP-002, Department Vehicle Usage.

## COUNT XVI

### UNSATISFACTORY WORK PERFORMANCE

61. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
62. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.12., which states:

“Officers will maintain sufficient competency to properly perform their duties and assume the responsibilities of their positions. Officers will perform their duties in a manner that will maintain the highest standards of efficiency in carrying out the functions and objectives of the Department. Unsatisfactory performance may be demonstrated by a lack of knowledge of the application of laws required to be enforced; an unwillingness or inability to perform assigned tasks; the failure to conform to work standards established for the officer’s rank, grade or position; the failure to take appropriate action on the occasion of a crime, disorder or other condition deserving police attention; the failure to successfully complete mandatory annual training requirements; or absence without leave. An isolated incident can be evidence of incompetency and/or unsatisfactory performance. In addition to other indications of unsatisfactory performance, the following will be considered prima facie evidence of unsatisfactory performance: repeated poor evaluations or a written record of repeated infractions of rules, regulations, directives or orders of the Department.”

**(First Offense – Level 1 Misconduct: Reprimand to 3 days)**

Respondent violated this rule in that on August 2, 2013, Respondent, while off-duty, knowingly allowed Echols, a convicted felon, to possess a firearm on his person, as he interacted with Calumet Park Police Officers while at Showtime's Sports Bar.

**COUNT XVII**

**UNSATISFACTORY WORK PERFORMANCE**

63. Paragraphs 1.-30. of this Complaint are incorporated as if restated fully herein.
64. All or a portion of the facts set forth herein constitute Respondent's violation of Department Directive ROC-002, Rules of Conduct, Paragraph III.A.12., which states:

"Officers will maintain sufficient competency to properly perform their duties and assume the responsibilities of their positions. Officers will perform their duties in a manner that will maintain the highest standards of efficiency in carrying out the functions and objectives of the Department. Unsatisfactory performance may be demonstrated by a lack of knowledge of the application of laws required to be enforced; an unwillingness or inability to perform assigned tasks; the failure to conform to work standards established for the officer's rank, grade or position; the failure to take appropriate action on the occasion of a crime, disorder or other condition deserving police attention; the failure to successfully complete mandatory annual training requirements; or absence without leave. An isolated incident can be evidence of incompetency and/or unsatisfactory performance. In addition to other indications of unsatisfactory performance, the following will be considered *prima facie* evidence of unsatisfactory performance: repeated poor

evaluations or a written record of repeated infractions of rules, regulations, directives or orders of the Department.”

**(First Offense – Level 1 Misconduct: Reprimand to 3 days)**

Respondent violated this rule in that from January 2012 to present, without authorization, Respondent worked numerous secondary employments, to include personal security for celebrity athletes in violation of PER-035, Secondary Employment, Paragraph III.A.2.

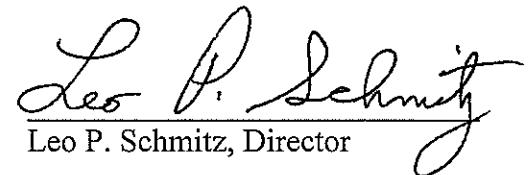
**CERTIFICATION**

A copy of Illinois State Police Department Directive ROC-002, Rules of Conduct, is attached and is certified by the Director as accurate, complete, and in full force and effect at the time the aforementioned acts were committed.

**CONCLUSION**

**WHEREFORE**, by reason of these facts and charges, I request the Illinois State Police Merit Board conduct a hearing in this matter and terminate Respondent from employment with the Illinois State Police.

Respectfully submitted,

  
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